

Moeller, J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MISS UNIVERSE L.P., LLLP, and
DONALD J. TRUMP, both individually and
derivatively on behalf of
MISS UNIVERSE L.P., LLLP,

Plaintiffs,

-against-

UNIVISION NETWORKS & STUDIOS, INC.
and ALBERTO CIURANA, individually,

Defendants.

USDC SDNY
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DATE FILED: 7/17/15

Case No. 15 CV 5377 (JGK) (JLC)

**STIPULATION AND ~~PROPOSED~~ ORDER FOR THE EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

WHEREAS, Plaintiffs Miss Universe L.P., LLLP and Donald J. Trump ("Plaintiffs")
filed a summons and complaint (collectively, the "Complaint") in the above-captioned matter on
June 30, 2015 in the Supreme Court of the State of New York, naming as defendants Univision
Networks & Studios, Inc. and Alberto Ciurana ("Defendants");

WHEREAS, Plaintiffs served the Complaint on Defendant Univision Networks &
Studios, Inc. on July 2, 2015;

WHEREAS, undersigned counsel for Defendants agreed to accept service on behalf of
Defendant Alberto Ciurana, which service was completed on July 15, 2015;

WHEREAS, Defendants filed a Notice of Removal in this Court on July 10, 2015, and
served the Notice of Removal on Plaintiffs on July 10, 2015;

WHEREAS, Defendants' response to the Complaint is currently due on July 23, 2015;

WHEREAS, the parties have agreed to an extension of Defendants' deadline to respond to August 26, 2015;

WHEREAS, this is Defendants' first request to extend the time to move, answer, or otherwise respond to the Complaint; and

WHEREAS, this Stipulation is entered without prejudice to Plaintiffs' right to request an extension of time to file papers in opposition to Defendants' responsive filings;

NOW THEREFORE, it is hereby stipulated and agreed, subject to the approval of the Court, that Defendants have until and including August 26, 2015 to move, answer, or otherwise respond to the Complaint in the above-captioned matter.

BELKIN BURDEN WENIG & GOLDMAN
LLP

By:

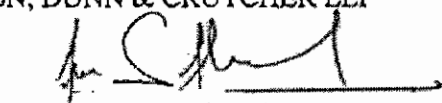

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*Attorneys for Defendants Univision Networks
& Studios, Inc. and Alberto Cuirana*

SO ORDERED:

Dated: 7/17/15


The Honorable John G. Koeltl
United States District Court Judge *tm*